

# Exhibit C

STATE OF WISCONSIN - CIRCUIT COURT - TAYLOR COUNTY

IN THE INTEREST OF

J.DOE, AN UNBORN CHILD,  
AND TAMARA M. LOERTSCHER

Case No. 14-JC-09

D/O/B [REDACTED]

FILED  
AUG 11 2014

TONI MATTHIAS  
PROBATE/JUVENILE DIVISION  
TAYLOR COUNTY, WIS.

**NOTICE OF MOTION AND MOTION FOR REMEDIAL CONTEMPT**

To: Tamara M. Loertscher

[REDACTED]  
Medford, WI [REDACTED]

Attorney Michael D. Shiffler, Guardian ad Litem for J. Doe, an unborn child, in this action moves based on the attached affidavit that Tamara M. Loertscher be ordered to purge herself of her contemptuous conduct or have one or more of the remedial sanctions provided for in Wis. Stat. § 785.04 imposed on her. This motion will be heard as follows:

**BEFORE:** Honorable Ann N. Knox-Bauer

**LOCATION:** Taylor County Courthouse, 224 S. 2<sup>nd</sup> Street, Medford, WI 54451

**DATE:** August 25, 2014

**TIME:** 10:30 a.m.

The basis for this motion is as stated in the attached affidavit dated this 11<sup>th</sup> day of August, 2014.

Date: 8-11-14

JENSEN, SCOTT, GRUNEWALD &  
SHIFFLER, S.C.

By: Michael D. Shiffler

Michael D. Shiffler  
Attorney for J. Doe an unborn child  
State Bar No. 1027582  
128 W. Division Street  
Medford, WI 54451  
(715)748-2211

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AFFIDAVIT OF LIZA DALEIDEN

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STATE OF WISCONSIN )  
                        )  
                        ) ss.  
COUNTY OF TAYLOR   )

Liza Daleiden, being first duly sworn on oath states:

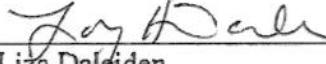
1. She is a social worker with Taylor County Human Services.
2. Tamara M. Loertscher is an expectant mother and J. Doe is an unborn child, and Tamara M. Loertscher is said unborn child's expectant mother.
3. Despite being pregnant, Loertscher has used controlled substances and consumed alcohol during her pregnancy. She tested positive for Cannabinol, Methamphetamines, Amphetamine on August 1, 2014, and August 5, 2014.
4. Taylor County Human Services has offered services to Loertscher. Loertscher has refused to accept alcohol or other drug abuse services offered to her.
5. For these reasons, Taylor County filed a petition for protection or care of unborn child in the above-captioned matter on August 5, 2014.
6. A temporary physical custody hearing was held, and the court issued an order for temporary physical custody on August 5, 2014. The court ordered that Loertscher be held in custody out of her home at a treatment facility to be determined by treating physician and program director of Taylor Count Human Services Department.
7. Loertscher be placed at a licensed treatment facility until the program directors deem it appropriate to release her. That Loertscher cooperate with Taylor County Human Services Department, that if she does not comply, she shall be held in contempt of court.
8. Tamara has failed to comply with the conditions ordered by the court. She has

intentionally failed to be placed at a licensed treatment facility and cooperate with Taylor County Human Services Department, specifically, she is required to take a TB test before she can be admitted to a licensed treatment facility, and she has refused to take a TB test.

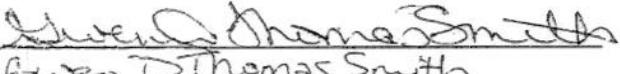
9. It is requested that Loertscher be able to terminate the above stated contempt of court and purge herself by submitting to a TB test and complying with all other prerequisites for her admission into a licensed treatment facility, after she completes said prerequisites, she commence her placement at a licensed treatment facility, specifically, Fahrman Center in Eau Claire, Wisconsin; that she cooperate with Taylor County Human Services; that she sign all releases requested by Taylor County Human Services that are necessary to facilitate treatment; and otherwise comply with the Order for Temporary Physical Custody. Or that alternatively, one or more of the remedial sanctions provided for in Wis. Stat. § 785.04 be imposed upon her.

10. She makes this affidavit in support of motion for remedial contempt.

Dated this 11<sup>th</sup> day of August 2014.

  
Liza Daleiden

Subscribed and sworn to before me this 11<sup>th</sup>  
day of August, 2014.

  
Gwen D. Thomas Smith  
Notary Public - State of Wisconsin  
My Commission expires: 10-12-14